

Buchwald, N.

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CONOPCO, INC. D/B/A UNILEVER,

Plaintiff,

v.

WELLS ENTERPRISES, INC.,

Defendant.

Case No.: 1:14-cv-02223-NRB-RLE

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DATE FILED: 09/22/2015**

WELLS ENTERPRISES, INC.,

Counterclaim Plaintiff,

v.

CONOPCO, INC. D/B/A UNILEVER,

Counterclaim Defendant.

STIPULATION TO EXTEND TIME

Plaintiff-Counterclaim Defendant Conopco, Inc. d/b/a Unilever ("Unilever"), and Defendant-Counterclaim Plaintiff Wells Enterprises, Inc. ("Defendant") (hereinafter collectively, the "Parties"), stipulate and agree that all deadlines set forth in the Court's August 18, 2015 order (the "Order") shall be extended by 30 days, as follows:

| Event | Current Deadline | Proposed Deadline |
|-----------------------------|--------------------|-------------------|
| Initial expert reports due | September 21, 2015 | October 21, 2015 |
| Rebuttal expert reports due | October 26, 2015 | November 25, 2015 |
| Close of all fact discovery | November 27, 2015 | December 28, 2015 |

| Event | Current Deadline | Proposed Deadline |
|---|-------------------|-------------------|
| Close of all expert discovery | December 16, 2015 | January 15, 2016 |
| Last day to file case dispositive motions | December 30, 2015 | January 29, 2016 |

This stipulation is the Parties' fourth request to extend the deadlines set forth in the case. Your Honor granted the Parties' previous requests to extend the case deadlines. The requested extension is not being sought for the purpose of delay, but so that the Parties can finalize the terms in their settlement agreement. Specifically, while the Parties have exchanged draft versions of a proposed settlement agreement, the parties require additional time to finalize a few of the terms in the agreement. Accordingly, the Parties, by and through their attorneys of record, hereby stipulate and request that the aforementioned dates set forth in the Court's August 18, 2015 order be continued as set forth above. The Parties submit the enclosed proposed Revised Scheduling Order.

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Wells Enterprises, Inc.

SO ORDERED:

Vanessa C. Hew
U.S.D.J.
9/21/15